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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

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OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

Command Technical (EPA Reg. No. 279-3052) and Command SUBJECT:

4 EC Herbicide (EPA Reg. No. 279-3053). Storage stability in RACs and Soils. MRID No.406333-01.

Branch Nos. 4510 & 4511.

FROM: Kenneth W. Dockter, Chemist

methodor Ha Special Registration Section I/

Dietary Exposure Branch

Health Effects Division (TS-769C)

THRU: A.R. Rathman, Section Head

Special Registration Section I

Dietary Exposure Branch

Health Effects Division (TS-769C)

TO:

James R. Yowell, PM Team # 25 Registration Division (TS-767C)

FMC Corporation has submitted additional storage stability data determining the stability of Command@ [2-(2chlorophenyl) methyl-4, 4-dimethyl-3-isoazolidinone; proposed common name = clomazone] residues in cottonseed, soybeans, tobacco, and soils. We defer to EFED for review of the soil The initial analyses (after 0, 3, and 6 months of frozen storage) showed no decline over the six month interval, which see J. Worthington 9/24/84 review; PP#4F3128. Current data reflects about 40 months of storage.

This laboratory study involved macerated commodities fortified with 0.2 or 0.5 ppm clomazone, dark frozen storage (-18°C), and analysis after 12, 24, and 40 months using a referenced residue GC/NP method. The analytical method included an acid reflux step, hexane partition, sodium bicarbonate wash, and Florisil column clean-up. The method detectability and sensitivity were 0.05 and 0.2 ppm, respectively. All samples showed no detectable decline in levels over the forty month interval; 15 months for cottonseed, a late addition to the study. Therefore, these data are adequate to show that the degradation of clomazone residues in experimental samples is not a problem.